

AMENDMENTS TO THE DRAWINGS

Attached hereto is a new figure sheet for added Figure 6.

REMARKS

By this amendment, no claims have been amended, cancelled, or added. Accordingly, claims 1-34 are currently pending in the application, of which claims 1, 9, 15, 19, 27, and 31 are independent claims. Claims 15-26 have been withdrawn from consideration.

Drawing Objection

In the Office Action, the drawings were objected to as not showing a flat panel display including a plurality of pixels having luminous devices, first and second transistors etc.

A unit pixel is shown in FIG. 1, number 100. An organic electroluminescent (EL) device is shown in FIG. 1, number 160. First and second transistors are shown in FIG. 1, numbers 140 and 145.

FIG. 6 has been added to show a flat panel display, number 50, including a plurality of pixels, number 100, as shown in the attached drawing sheet.

Applicants assert that FIG. 6 does not include new matter because a flat panel display including a plurality of pixels is described at least on page 4, lines 3-9.

Accordingly, Applicants respectfully request withdrawal of the drawing objection.

Rejections Under 35 U.S.C. § 102

Claims 1-6, 9-12 and 27-34 stand rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U. S. Pre-grant Publication No. 2003/0234759 applied for by Bergquist, *et al.* ("Bergquist"). Applicants respectfully traverse this rejection for at least the following reasons.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Bergquist fails to anticipate claims 1, 9, 27, and 31 because Bergquist does not expressly or inherently describe each and every element set forth in claims 1, 9, 27 and 31.

With regard to claims 1 and 27, Bergquist at least fails to teach that a semiconductor layer of the first transistor has a mobility which is different from a semiconductor layer of the second transistor.

The Office Action alleges that paragraph (0009) of Bergquist teaches a pixel in which one transistor includes polycrystalline silicon, and another transistor includes amorphous silicon. Applicants respectfully disagree.

Bergquist teaches a pixel that includes two TFT's (FIG. 3, nos. 32 and 36) and that the field effect switching transistor and the first drive transistor are normally thin film transistors (TFT) formed from semiconductors such as hydrogenated amorphous silicon (a-Si:H) or low temperature polysilicon (p-Si) (paragraph 0013). However, paragraph (0013) of Bergquist does not teach that that a semiconductor layer of the first transistor has a mobility which is different from a semiconductor layer of the second transistor.

Paragraph (0013) of Bergquist teaches that the field effect switching transistor and the first drive transistor may include "hydrogenated amorphous silicon (a-Si:H) or low temperature polysilicon (p-Si)". The word "or" is defined as being "used as a function word to indicate an alternative". "or." Merriam-Webster Online Dictionary. 2006. <http://www.merriam-webster.com> (10 Jan. 2006). Therefore, by the plain definition of the word "or", Bergquist is describing that the field effect switching transistor and the first drive transistor are both made of the same type of silicon. Without additional disclosure, this sentence cannot be fairly read to mean that one of the TFTs is formed from hydrogenated amorphous silicon and that the other TFT is formed from low temperature polysilicon.

Therefore, because Bergquist only teaches using one type of silicon or another type of polysilicon in the same pixel, Bergquist necessarily does not teach that a semiconductor layer of the first transistor has a mobility which is different from a semiconductor layer of the second transistor as is required by claims 1 and 27.

With regard to claims 9 and 31, for the reasons noted above with regard to claims 1 and 27, Bergquist at least fails to teach that a semiconductor layer of the first transistor has a crystal structure which is different from a crystal structure of the second transistor.

Furthermore, the Office action states that "one transistor includes polycrystalline silicon, whereas the other semiconductor includes amorphous silicon." Assuming, *arguendo*, that this sentence correctly characterized Bergquist, Bergquist would still not anticipate the inventions defined by claims 9 and 31 because a semiconductor including amorphous silicon would not have a crystal structure. Amorphous silicon, by definition, does not have a crystal structure. Consequently, a semiconductor layer of the first transistor could not possibly have a crystal structure which is different from a crystal structure of the second transistor.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(e) rejection of claims 1-6, 9-12, and 27-34. Since none of the other prior art of record discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 1, 9, 27, and 31, and all the claims that depend therefrom are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,



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